



**DCOR, LLC  
290 Maple Court, Suite 290  
Ventura, Ca 93003**

**August 24, 2016  
Mr. Colby Tucker  
USEPA Region 9  
Enforcement Division ENF 3-1  
75 Hawthorne Street  
San Francisco, CA 94105**

**RE: March 7 and March 9, 2016 Clean Water Act Inspections  
DCOR Responses to Concerns - Platform A and Hillhouse**

**Dear Mr. Colby Tucker,**

**This is in response to your email, dated July 19, 2016. Please see below for DCOR's responses to those areas of concerns as delineated in section III of your inspection report. As you wanted, DCOR's responses have been arranged to match the numbered items in the inspection report.**

**If you have any question or need anything further, please feel free to contact me.**

**Best Regards,**

**Sincerely,**

A handwritten signature in blue ink, appearing to read "R. J. Rao", written over the word "Sincerely,".

**Jay Rao**

**DCOR, LLC  
(805)535-2078**

### **Section III-Areas of Concerns: Platform A**

1. Part II. E, Domestic and Sanitary Wastes (Discharge 005), Footnote 2, of the permit states “Any facility which properly operates and maintains a marine sanitation device (MSD) that was certified by the United States Coast Guard (USCG) under section 312 of the act, shall be deemed to be in compliance with the permit limitations for sanitary wastes and the requirements for total residual chlorine do not apply. The MSD shall be inspected yearly for proper operation, and the inspection results maintained with the permit records.” The total and fecal coliform USCG “Appropriate standards” in 40 CFR Part 140.3(d) state that “after January 30, 1980, subject to paragraphs(e) and (f) of this section, Marine sanitation devices on all vessels on waters that are not subject to a prohibition of the overboard discharge of sewage , treated or untreated, as specified in paragraph (a) (1) of this section, shall be designed and operated to either retain, dispose of, discharge sewage, and shall be certified by the U.S. Coast Guard. If the device has a discharge, the effluent shall not have a coliform bacterial count greater than 200 per 100 milliliters (i.e., 200 Most Probable Number (MPN/100mL), nor suspended solids greater than 150 mg/L.”

DCOR response: Marine Sanitation Device (MSD) at Platform A is USCG-Certified and, as per the NPDES permit, is inspected annually for proper operation and the inspection records are maintained.

Corrective Action: Going forward, DCOR would strictly follow the manufacturer’s recommendations for the annual inspections and the same would be documented.

2. Part 1.A.5 Requirements for NPDES Permits and Coverage Conditions – Prohibitions of the permit states “During the term of this general permit, operators are authorized to discharge under the general permit the enumerated waste streams subject to the restrictions set forth herein. This permit does not authorize the discharge of any waste streams, including spills and other unintentional or non-routine discharges of pollutants, that are not part of the normal operation of the facility, or any pollutants that are not ordinarily present in such waste streams.” Part II.E Domestic and Sanitary Wastes (Discharge 005) of the permit states there shall be no discharge of floating solids.

We observed that the facility MSD unit was equipped with drain manifold and valves between the media chamber and disinfection chamber with the drain piping discharging directly to the Pacific Ocean. At the time of the inspection, all the chamber drain valves were closed and no discharge was observed from the

discharge piping to the Pacific Ocean. Facility representative did not know at the time of the inspection, if any discharge ever occurred from the MSD unit media and disinfection chambers via this discharge piping.

DCOR Response: These Drain manifold and valves are designed for the MSD cleanout purpose only. During the cleanout, the drain valves are opened to collect the waste into a Marine Potable Tank (MPT) - it is never discharged to the Pacific Ocean.

3. Part II. E Domestic and Sanitary Wastes (Discharge 005) and Footnote 4 of the Permit states there shall be no discharge of foam or floating solids from domestic (greywater) and "the discharge of food waste is prohibited within 12 nautical miles from the nearest land.

We observed an active domestic (greywater) piping leak discharge to the receiving water (Pacific Ocean) at the time of the inspection. As a result of the leak, not all greywater was being discharged at the designated location (Discharge 005).

Corrective Action: Grey Water leaking pipe has been replaced on 3/22/2016, and the leak has completely stopped.

4. Part II.B Monitoring, Recording and Reporting Requirements of the Permit states "Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity."

During the inspection, we observed a bypass line around the produced water NPDES Oil and Grease sample location. At the time of the inspection, the produced water NPDES point bypass piping was not in operation as indicated by the closed valve.

DCOR Response: Whenever there is problem with automatic level control valve on the Wemco unit, this bypass valve is opened to manually control the fluid level. This is kept open till the automatic level control valve is either replaced or repaired. Online Turbidity meter would still be functional to monitor the overboard discharge.

5. Part IV.(e) Proper Operation and Maintenance of the Permit states that " The Permittee shall at all times properly operate and maintain all facilities and system of treatment and control(and related appurtenances) which are installed or used by the Permittee to achieve compliance with the conditions of this permit."

We observed that the Discharger lacked a formal, reproducible process and SOPs for scheduling and documenting maintenance activities. Facility representatives provided us with a demonstration of their CMMS Mainsaver program at the time of the inspection. The facility had a total of 40 open work orders and a total of 295 work orders at the time of the inspection. We observed that the Discharger's CMMS was not being utilized to adequately generate and document corrective action work orders or to address immediate maintenance items for NPDES treatment units at the facility. For example, the discharger was not utilizing the CMMS system to generate and track potential immediate repair needs for the facility gross oil and water separators, but rather would just complete the work without entering into CMMS, documenting, or tracking repairs to ensure proper operation and maintenance of the process units at the facility.

Corrective Actions: The Lead Operators have been instructed the following:

- Ensure that the all Preventive Maintenance (PM) work orders are generated as scheduled.
- Complete using the SOP as applicable.
- Close using the actual completion date, labor and material costs and a summary of the work performed.
- Post work order labor and material

Note: Should additional work be required that is not part of a PM work order, a corrective work order should be created. When closing a corrective work order, use the same procedure as when closing a PM work order.

6. Part III.E Record contents of the permit require that the following monitoring information be documented: "1. The date, exact place, and time of sampling or measurements; 2. The individual(s) who performed the sampling or measurements; 3. The date(s) analyses were performed; 4. The individual(s) who performed the analyses; 5. The analytical techniques or methods used; and 6. The results of such analyses."

We observed that the Discharger's SOP for produced water Oil and Grease sampling and handling did not include minimum monitoring information requirements or requirements to ensure proper sample collection, preservation, and hold times (refer to Exhibit 6). Specifically, the Discharger SOPs did not clearly describe the exact sample location for produced water oil and grease waste stream as "Discharge 002", or that oil and grease samples should be labeled for type of sample as "grab" or "composite". Note that Table 6-Produced Water Effluent Limitations and Monitoring Requirements of the Permit states that

the Discharger's oil and grease produced water sample type/method shall be either a grab sample or composite sample. Additionally, the SOPs did not include information or requirements for oil and grease sample preservation (i.e.  $\leq 6^{\circ}\text{C}$  within 15 minutes of collection for grab samples) or maximum holding time (e.g. 28 days for oil and grease), as detailed in 40CFR Part 136 and required by Part II.B.6 produced water monitoring requirements of the permit. We further observed that the SOPs did not ensure that the samples collection method for produced water oil and grease samples would ensure that the laboratory provided sample bottle preservative of Hydrochloric Acid (HCl) would be maintained. For example, the Discharger's SOP did not provide sample collection and handling guidance on not overfilling the oil and grease sample to prevent the loss of HCl preservative.

Corrective Action: SOP has been revised to address the above concerns.

7. Part II.C.3, Well Treatment, Completion and Workover Fluids (Discharge 003), Chemical Inventory, section of permit, requires "The Permittee shall maintain an inventory of the quantities and concentration of the specific chemicals used to formulate well treatment, completion and workover fluids. If there is a discharge of these fluids, the chemical formulation, concentrations and discharge volumes of the fluids shall be submitted with the DMR. For discharges of well treatment, completion and workover fluids, the type of operation that generated the discharge fluids shall also be reported.

We observed that the Discharger did not submit with the DMRs a chemical inventory, including chemical formulation and concentration of these fluids used for well treatment, completion and workover fluids.

Response: Ever since DCOR became the operator, Discharge 003 has never occurred at Platform A. Also, DCOR always maintains (and uploads as an attachment into NetDMR portal) the list of chemicals (volume/weight) as and when used for Well Treatment, Completion or Workover.

### **Section III-Areas of Concerns: Hillhouse**

1. Part II.B.3, Produced Water Commingled Waste Streams, of the Permit, states “ If deck drainage, work over, completion, well treatment or test fluids or other authorized discharges are commingled with produced water “commingled” shall be reported on the DMRs for both produced water and the waste stream mixed with it.”

As a result of our eDMRs that deck drainage (Discharge 004) and fire control system water (Discharge 008) were “commingled” with produced water discharges (Discharge 002). We observed that the Discharger reported “No Discharge” on eDMRs for both deck drainage (Discharge 004) and fire control system water (Discharge 008), which is not consistent with the permit requirements.

Response:

- Deck Drainage (Discharge 004): At Platform Hillhouse deck drainage is always commingled with produced water, and hence reported as “no-discharge” in NetDMRs. The total commingled volume is reported as produced water (Discharge 002) in NetDMRs.
  - Fire Control System Water (Discharge 008): At Platform Hillhouse Fire Water System Water is not commingled with produced water, rather discharged directly overboard as Discharge 008. The only thing that is not discharged is Chlorine, because no Chlorine is added to Fire Control System Water at Hillhouse. However, visual observations for any floating solids, waste, visible foam or sheen are reported in NetDMRs.
2. Part III.E Record contents of the permit require that the following monitoring information be documented: “1. The date, exact place, and time of sampling or measurements; 2. The individual(s) who performed the sampling or measurements; 3. The date(s) analyses were performed; 4. The individual(s) who performed the analyses; 5. The analytical techniques or methods used; and 6. The results of such analyses.”

We observed that the Discharger’s SOP for produced water Oil and Grease sampling and handling did not include minimum monitoring information requirements or requirements to ensure proper sample collection, preservation, and hold times (refer to Exhibit 6). Specifically, the Discharger SOPs did not clearly describe the exact sample location for produced water oil and grease waste stream as “Discharge 002”, or that oil and grease samples should be labeled for type of sample as “grab” or “composite”. Note that Table 6-Produced

Water Effluent Limitations and Monitoring Requirements of the Permit states that the Discharger's oil and grease produced water sample type/method shall be either a grab sample or composite sample. Additionally, the SOPs did not include information or requirements for oil and grease sample preservation (i.e.  $\leq 6^{\circ}\text{C}$  within 15 minutes of collection for grab samples) or maximum holding time (e.g. 28 days for oil and grease), as detailed in 40CFR Part 136 and required by Part II.B.6 produced water monitoring requirements of the permit. We further observed that the SOPs did not ensure that the samples collection method for produced water oil and grease samples would ensure that the laboratory provided sample bottle preservative of Hydrochloric Acid (HCl) would be maintained. For example, the Discharger's SOP did not provide sample collection and handling guidance on not overfilling the oil and grease sample to prevent the loss of HCl preservative.

Corrective Action: SOP has been revised to address the above concerns.

3. Part II.C.3, Well Treatment, Completion and Workover Fluids (Discharge 003), Chemical Inventory, section of permit, requires "The Permittee shall maintain an inventory of the quantities and concentration of the specific chemicals used to formulate well treatment, completion and workover fluids. If there is a discharge of these fluids, the chemical formulation, concentrations and discharge volumes of the fluids shall be submitted with the DMR. For discharges of well treatment, completion and workover fluids, the type of operation that generated the discharge fluids shall also be reported.

We observed that the Discharger did not submit with the DMRs a chemical inventory, including chemical formulation and concentration of these fluids used for well treatment, completion and workover fluids.

Response: Ever since DCOR became the operator, Discharge 003 has never occurred at Platform Hillhouse. However, DCOR always maintains (and uploads as an attachment into NetDMR portal) the list of chemicals (volume/weight) as and when used for Well Treatment, Completion or Workover.

4. Part II. E, Domestic and Sanitary Wastes (Discharge 005), Footnote 2, of the permit states "Any facility which properly operates and maintains a marine sanitation device (MSD) that was certified by the United States Coast Guard (USCG) under section 312 of the act, shall be deemed to be in compliance with the permit limitations for sanitary wastes and the requirements for total residual chlorine do not apply. The MSD shall be inspected yearly for proper operation,

and the inspection results maintained with the permit records.” The total and fecal coliform USCG “Appropriate standards” in 40 CFR Part 140.3(d) state that “after January 30, 1980, subject to paragraphs(e) and (f) of this section, Marine sanitation devices on all vessels on waters that are not subject to a prohibition of the overboard discharge of sewage , treated or untreated, as specified in paragraph (a) (1) of this section, shall be designed and operated to either retain, dispose of, discharge sewage, and shall be certified by the U.S. Coast Guard. If the device has a discharge, the effluent shall not have a coliform bacterial count greater than 200 per 100 milliliters (i.e., 200 Most Probable Number (MPN/100mL), nor suspended solids greater than 150 mg/L.”

DCOR response: Marine Sanitation Device (MSD) at Platform Hillhouse is USCG-Certified and, as per the NPDES permit, is inspected annually for proper operation, and the inspection records are maintained.

Corrective Action: Going forward, DCOR would strictly follow the manufacturer’s recommendations for the annual inspections and the same would be documented.

5. Part II.F, Miscellaneous Discharges (Discharges 006-022) and Table 10 – Effluent Limitations and Monitoring Requirements, of the Permit, states that daily daylight hour visual observation (i.e., foam or floating solids) monitoring of the surface of the receiving water in the vicinity of the discharge shall be conducted.

We observed that the facility representatives were not familiar with the frequency of the desalination unit’s use or the associated waste stream discharges to the Pacific Ocean (Discharge 007). Because the desalination unit was not in use at the time of the inspection, it was also unknown if the facility conducted daily daylight hour visual observation monitoring and recordkeeping of the desalination unit waste stream when in use. The desalination unit (was in standby mode during the facility walk through.

Response: Desalination unit is now back in service, and its waste stream is discharged (Discharge 007) to the Pacific Ocean through 1” rigid PVC pipe.

The facility does conduct daily daylight- hour visual observation at 4-hours intervals in the vicinity of this discharge (007) and the same is recorded.



6. Part IV.(e) Proper Operation and Maintenance of the Permit states that “ The Permittee shall at all times properly operate and maintain all facilities and system of treatment and control(and related appurtenances) which are installed or used by the Permittee to achieve compliance with the conditions of this permit.”

- a. We observed what appeared to be an active petroleum leak from a pipe connection running down the side of the sump tank/vessel. The sump tank/vessel receives deck drainage and fire control system water prior to being pumped into the onsite repurposed platform Henry treater, now known as the settling tank. The deck drainage and fire control system water
- b. We observed that the Discharger lacked a formal, reproducible process and SOPs for scheduling and documenting maintenance activities. Facility representatives provided us with a demonstration of their CMMS Mainsaver program at the time of the inspection. The facility had a total of 40 open work orders and a total of 295 work orders at the time of the inspection. We observed that the Discharger’s CMMS was not being utilized to adequately generate and document corrective action work orders or to address immediate maintenance items for NPDES treatment units at the facility. For example, the discharger was not utilizing the CMMS system to generate and track potential immediate repair needs for the facility gross oil and water separators, but rather would just complete the work without entering into CMMS, documenting, or tracking repairs to ensure proper operation and maintenance of the process units at the facility.

Corrective Actions: The Lead Operators have been instructed the following:

- Ensure that the all Preventive Maintenance (PM) work orders are generated as scheduled.
- Complete using the SOP as applicable.
- Close using the actual completion date, labor and material costs and a summary of the work performed.
- Post work order labor and material

Note: Should additional work be required that is not part of a PM work order, a corrective work order should be created. When closing a corrective work order, use the same procedure as when closing a PM work order.